



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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July 9, 2012

Mr. David Libman
Fort Pulaski National Monument – GMP
National Park Service
Southeast Regional Office
Planning and Compliance Division
100 Alabama St., 1924 BLDG
Atlanta, GA 30303

SUBJECT: EPA Comments on the Draft Environmental Impact Statement (DEIS) for the
Fort Pulaski National Monument, Draft General Management Plan, Wilderness
Study and Environmental Impact Statement
Savannah, Chatham County, Georgia
CEQ #: 20120139; ERP #: NPS-E61081-GA

Dear Mr. Libman:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Draft Environmental Impact Statement (DEIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The National Park Service (NPS) proposes changes to General Management Plan for the Fort Pulaski National Monument. The purpose of the DEIS is to provide a comprehensive management plan that helps the NPS fulfill the national monument purpose, maintain its significance, and protect its resources for present and future generations. The DEIS also includes a wilderness study that evaluated options for designating wilderness areas at Fort Pulaski,

Fort Pulaski is located between Savannah and Tybee Island on the Georgia coast. The site contains 5,365 acres on Cockspur and McQueens islands. The Fort was declared a national monument on October 15th, 1924, under the authority of Section 2 of the Antiquities Act. In 1936, Fort Pulaski was expanded to include all lands on Cockspur Island, and donated lands, easements and improvements on McQueens and Tybee islands. According to the DEIS, the Fort was built to help “protect the eastern seaboard cities after the British burned the city of Washington during the War of 1812.” In 1862, “the bombardment of Fort Pulaski by rifled cannons during the Civil War resulted in the breach of its “invincible” walls and the surrender of its garrison to Union forces (pg 3).”

The DEIS examines three alternatives for managing Fort Pulaski for the next 20 years. It analyzes the impacts of implementing each of the alternatives. Alternative A is the "no action" alternative that continues current park management strategies and serves as a basis for comparison in evaluating the other alternatives. Alternative B is the NPS's preferred alternative that emphasizes the restoration of the cultural landscape of Cockspur Island similar to the 1862 period of significance. This alternative involves tree removal and relocating the visitor parking lot to an area not visible from the terreplein (gun deck) of the Fort. Alternative C emphasizes a wider range of interpretive themes including natural resources and historic periods. This alternative places less emphasis on historic landscape restoration and views. Both "action" alternatives include a proposal to construct a new visitor's center annexes that will be described in a future planning project.

EPA notes that the DEIS discusses the decision-making process known as "Choosing by Advantages" that was used to select the preferred alternative. The scores resulting from the process were similar for Alternative B and C; however, Alternative B would restore the 1862 viewshed, protect cultural resources like the veterans cemetery, remove more exotic and invasive species and provide better interpretation opportunities due to the proposed restoration of most historic site conditions and views. Alternative B would also impact more trees which the DEIS indicates would be mitigated. Therefore, EPA recommends that the FEIS include more details regarding proposed tree loss and mitigation. For example, the FEIS should denote approximately how much more vegetation or tree loss may be impacted by Alternative B compared to C and describe potential mitigation in terms of tree replacement ratios, replacement species/types of trees or consistency with any tree replacement guidelines, etc.

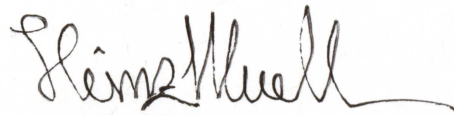
The DEIS discusses the NPS's efforts to comply with the Endangered Species Act and Section 106 of the National Historic Preservation Act. According to the DEIS, the NPS has informally coordinated with the U.S. Fish and Wildlife Service on threatened and endangered species and the Georgia Historic Preservation Division on historic properties. While the NPS describes various coordination efforts, the FEIS should document resource agency formal consultations including concurrence with the NPS's determination that the proposed project is not likely to adversely affect any federally threatened or endangered species and Section 106 determinations regarding the relocation of the parking area for the Mission 66 visitor center.

The NPS conducted a wilderness study for Fort Pulaski related to lands that were previously found eligible for wilderness designation. Based on a wilderness eligibility assessment, approximately 4,500 acres of tidal salt marsh at McQueen's island was found eligible. Both action alternatives propose the same amount of acreage for designation as part of the National Wilderness Preservation System. EPA supports the preservation and restoration of the salt marsh areas at Fort Pulaski as proposed by the NPS. This designation would help to preserve and protect the natural state of the salt marsh, and provide for "compatible recreational opportunities, education, and scientific study."

Again, EPA supports the preservation and restoration of 4,500 acres of salt marsh at Fort Pulaski. We appreciate the NPS balancing visitor experience needs and enhancing recreational opportunity with the need to protect sensitive cultural and ecological resources. We understand that Alternative B balances those needs; and based on our DEIS review, EPA rates this document "LO" (Lack of Objections). Attached is a summary of definitions for EPA ratings.

We appreciate the opportunity to review the proposed action. If we can be of further assistance, please feel free to contact Ntale Kajumba at (404) 562-9620 or kajumba.ntale@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Heinz Mueller", with a long horizontal flourish extending to the right.

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management